

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

San Francisco, California 94111-4788

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF THE
DECLARATION OF ARTURO J
GONZÁLEZ IN RESPONSE TO
COURT'S ORDER REQUIRING
DECLARATIONS AND EXHIBITS
THERTO**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Administrative Motion to File Under
7 Seal Portions of the Declaration of Arturo J. González in Response to the Court’s Order Requiring
8 Declarations and Exhibits Thereto (“Administrative Motion”). The Administrative Motion seeks an
9 order sealing highlighted portions of the Declaration of Arturo J. González in Response to the Court’s
10 Order Requiring Declarations (“González Declaration”) and of Exhibits 6 and 7¹ thereto, as well as
11 the entirety of Exhibit 3.

12 3. Exhibit 3 (portions marked in green boxes in versions filed herewith) contains,
13 references, and/or describes the scope of Waymo’s relevant forensic investigation conducted by
14 Google’s security team, including the identity of one or more non-public targets of those
15 investigations. I understand that Waymo maintains this information as confidential. The public
16 disclosure of this information would cause significant harm and embarrassment to these non-public
17 persons.

18 4. Exhibits 6 and 7 (green highlighted portions) contain, reference, and/or describe
19 Waymo’s trade secret information. The information Waymo seeks to seal includes the confidential
20 design and functionality of Waymo’s proprietary autonomous vehicle system, including its LiDAR
21 designs, which Waymo maintains as secret. I understand that these designs are maintained as secret
22 by Waymo (Dkt. 25-47) and that the designs are valuable to Waymo’s business (Dkt. 25-31). The
23 public disclosure of this information would give Waymo’s competitors access to descriptions of the
24

25
26 ¹ The Administrative Motion lists Exhibits 5 and 6 in the table therein, but it was actually
27 Exhibits 6 and 7 that were filed partially under seal.
28

1 functionality or features of Waymo's autonomous vehicle system. If such information were made
2 public, I understand that Waymo's competitive standing would be significantly harmed.

3 5. Waymo's request to seal is narrowly tailored to those portions of Exhibits 3, 6, and 7
4 that merit sealing

5
6 I declare under penalty of perjury under the laws of the State of California and the United
7 States of America that the foregoing is true and correct, and that this declaration was executed in San
8 Francisco, California, on September 19, 2017.

9 By /s/ Felipe Corredor

10 Felipe Corredor

11 Attorneys for WAYMO LLC
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from Felipe Corredor.

By: /s/ Charles K. Verhoeven
Charles K. Verhoeven